



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

### NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

#### **Preliminary Findings Regarding a New Source Construction and Minor Source Operating Permit (MSOP)**

**for Fortress Technologies, LLC in Elkhart County**

**Minor Permit No. M039-32633-00736**

The Indiana Department of Environmental Management (IDEM) has received an application from Fortress Technologies, LLC located at 14489 US 20, Middlebury, Indiana, for a new source construction and a Minor Source Operating Permit (MSOP). IDEM's Office of Air Quality (OAQ) issues this type of permit to regulate the construction and operation of new sources that release air pollutants.

IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several associated documents, that would allow Fortress technologies, LLC, to construct and operate a new stationary travel trailer frame manufacturing facility.

A copy of the permit application and IDEM's preliminary findings are available at:

Middlebury Community Public Library  
P. O. Box 192, 101 E. Winslow Street  
Middlebury, IN 46540

And

IDEM Northern Regional Office  
300 N. Michigan Street, Suite 450  
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/ideM-caats/>.

#### **How can you participate in this process?**

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so

that you can be added IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M039-32633-00736 in all correspondence.

**Comments should be sent to:**

Swarna Prabha  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-5376  
Or dial directly: (317) 234-5376  
Fax: (317) 232-6749 attn: Swarna Prabha  
E-mail: sprabha@idem.in.gov

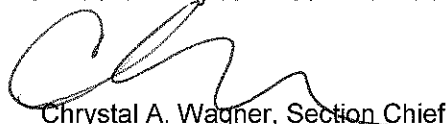
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: [www.idem.in.gov](http://www.idem.in.gov).

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251, and IDEM Northern Regional Office, 300 N. Michigan Street, Suite 450, South Bend, IN 46601-1295.

If you have any questions please contact Swarna Prabha or my staff at the above address.



Chrystal A. Wagner, Section Chief  
Permits Branch  
Office of Air Quality

CAW/SP



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DRAFT

## New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

**Fortress Technologies, LLC**  
**14489 US 20**  
**Middlebury, Indiana 46540**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M039-32633-00736	
Issued by:	Issuance Date:
Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

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The Permittee owns and operates stationary travel trailer frame manufacturing facility.

Source Address:	14489 US 20, Middlebury, Indiana 46540
General Source Phone Number:	574-825-4900
SIC Code:	3004
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary

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This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) powder spray booth, identified as EU1, approved in 2013 for construction, equipped with an integral cartridge filtration system, capacity: 20 steel trailer parts coated per hour, total maximum 6.5 tons/hr of parts coated per hour, maximum 83.52 pounds of powder per hour.
- (2) One (1) powder spray booth, identified as EU2, approved in 2013 for construction, equipped with an integral cartridge filtration system, capacity: 20 steel trailer parts coated per hour, total maximum 6.5 tons/hr of parts coated per hour, maximum 83.52 pounds of powder per hour.
- (3) One (1) blast room, identified as SB1, approved in 2013 for construction to clean trailer frames, maximum capacity of 6.5 tons/hr of steel frames, and 150 lb/hr of media, equipped with particulate control, exhausting inside.
- (4) One hundred forty (140) metal inert gas (MIG) welding stations, approved in 2013 for construction, each with a maximum electrode usage rate of 4.0 lbs of wire per hour.
- (5) Natural Gas Combustion:
  - (a) One (1) natural gas-fired dry-off oven, rated at 10.80 million British thermal units per hour (MMBtu/hr), with a maximum capacity of 6.5 tons per hour of parts, exhausting outside.
  - (b) One (1) natural gas-fired curing oven, rated at 10.80 million British thermal units per hour (MMBtu/hr), with a maximum capacity of 6.5 tons per hour of parts, exhausting outside.
  - (c) Seven (7) natural gas-fired heaters, identified as t1 through t7, capacity: 0.01 million British thermal units per hour each, exhausting outside.
  - (d) Two (2) natural gas-fired forced air furnaces, identified as f1 and f2, approved in 2013 for construction, capacity: 0.125 million British thermal units per hour each, exhausting outside.

- (e) Ten (10) natural gas-fired GFA heaters, identified as gfa1 and gfa10, approved in 2013 for construction, capacity: 1.75 million British thermal units per hour each, exhausting outside.
- (f) Two (2) natural gas-fired GFA heaters, identified as gfa11 and gfa12, approved in 2013 for construction, capacity: 1.75 million British thermal units per hour each, exhausting outside.

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-1.1-1]

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

### B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

---

- (a) This permit, M039-32633-00736, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.6 Enforceability

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Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.



**B.7 Severability**

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

**B.8 Property Rights or Exclusive Privilege**

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This permit does not convey any property rights of any sort or any exclusive privilege.

**B.9 Duty to Provide Information**

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**B.11 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M039-32633-00736 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

---

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.14 Permit Renewal [326 IAC 2-6.1-7]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.16 Source Modification Requirement**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

**B.17 Inspection and Entry**

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[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

---

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

**B.19 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.20 Credible Evidence [326 IAC 1-1-6]**

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Permit Revocation [326 IAC 2-1.1-9]**

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

**C.3 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

**Testing Requirements [326 IAC 2-6.1-5(a)(2)]**

**C.8 Performance Testing [326 IAC 3-6]**

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

**C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

**Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

**C.10 Compliance Monitoring [326 IAC 2-1.1-11]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

**C.11 Instrument Specifications [326 IAC 2-1.1-11]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps**

**C.12 Response to Excursions or Exceedances**

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Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

**C.13 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.



- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

#### **Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**

##### **C.14 Malfunctions Report [326 IAC 1-6-2]**

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

##### **C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

##### **C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue

MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (1) One (1) powder spray booth, identified as EU1, approved in 2013 for construction, equipped with an integral cartridge filtration system, capacity: 20 steel trailer parts coated per hour, total maximum 6.5 tons/hr of parts coated per hour, maximum 83.52 pounds of powder per hour.
- (2) One (1) powder spray booth, identified as EU2, approved in 2013 for construction, equipped with an integral cartridge filtration system, capacity: 20 steel trailer parts coated per hour, total maximum 6.5 tons/hr of parts coated per hour, maximum 83.52 pounds of powder per hour.
- (3) One (1) blast room, identified as SB1, approved in 2013 for construction to clean trailer frames, maximum capacity of 6.5 tons/hr of steel frames, and 150 lb/hr of media, equipped with particulate control, exhausting inside.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

#### D.1.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the powder spray booths, identified as EU1 and EU2, shall each be limited to less 14.37 pounds per hour, when operating at a maximum process weight rate of 6.5 tons per hour of metal each.
- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from blast room, identified as SB1, shall be limited to less 14.87 pounds per hour, when operating at a maximum process weight rate of 6.58 tons per hour of metal including media.

The pounds per hour limitation was calculated with the following equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour;}$$

$$P = \text{process weight rate in tons per hour}$$

#### D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for powder booths, identified as EU1 and EU2, the powder reclaim system for each booth, and the cartridge filtration system which is considered integral to the system, and blaster SB1. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.1.3 Particulate Control

- (a) In order to comply with Condition D.1.1(a), the cartridge filtration system, integral to each of the coating booths for particulate control, shall be in operation at all times when the respective powder coating booths, identified as EU1 and EU2 are in operation.
- (b) In order to comply with Condition D.1.1(b), the control system for particulate control shall be in operation and control emissions from the blaster, identified as SB1, at all times that the blaster is in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	Fortress Technologies, LLC
<b>Address:</b>	14489 US 20
<b>City:</b>	Middlebury, Indiana 46540
<b>Phone #:</b>	574-825-4900
<b>MSOP #:</b>	M039-32633-00736

I hereby certify that Fortress Technologies, LLC is :

☐ still in operation.

☐ no longer in operation.

I hereby certify that Fortress Technologies, LLC is :

☐ in compliance with the requirements of  
MSOP M039-32633-00736.

☐ not in compliance with the requirements of  
MSOP M039-32633-00736.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FAX NUMBER: (317) 233-6865**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100 TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ?    Y        N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y        N

COMPANY: \_\_\_\_\_ PHONE NO. (    ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO<sub>2</sub>, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_  
INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

### **326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

### **326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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Mail to: Permit Administration and Support Section  
Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Fortress Technologies, LLC  
14489 US 20  
Middlebury, Indiana 46540

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make  
these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that Fortress Technologies, LLC, 14489 US 20, Middlebury, Indiana 46540, completed construction of the manufacturing travel trailers on \_\_\_\_\_ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on December 13, 2012 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M039-32633-00736, Plant ID No. 039-00736 issued on \_\_\_\_\_.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a New Source Construction and  
Minor Source Operating Permit (MSOP)**

<b>Source Description and Location</b>
--

<b>Source Name:</b>	<b>Fortress Technologies, LLC</b>
<b>Source Location:</b>	<b>14489 US 20, Middlebury, IN 46540</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3004</b>
<b>Operation Permit No.:</b>	<b>M039-32633-00736</b>
<b>Permit Reviewer:</b>	<b>Swarna Prabha</b>

On December 13, 2012, the Office of Air Quality (OAQ) received an application from Fortress Technologies, LLC related to the construction and operation of a new stationary travel trailer frame manufacturing facility.

<b>Existing Approvals</b>
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There have been no previous approvals issued to this source.

<b>County Attainment Status</b>
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The source is located in Elkhart County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective July 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
Elkhart County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub>



emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

<b>Fugitive Emissions</b>
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Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

<b>Background and Description of New Source Construction</b>
--

The Office of Air Quality (OAQ) has reviewed an application, submitted by Fortress Technologies, LLC on December 12, 2012, relating to the construction and operation of travel trailer frame manufacturing facility.

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) powder spray booth, identified as EU1, approved in 2013 for construction, equipped with an integral cartridge filtration system, capacity: 20 steel trailer parts coated per hour, total maximum 6.5 tons/hr of parts coated per hour, maximum 83.52 pounds of powder per hour.
- (2) One (1) powder spray booth, identified as EU2, approved in 2013 for construction, equipped with an integral cartridge filtration system, capacity: 20 steel trailer parts coated per hour, total maximum 6.5 tons/hr of parts coated per hour, maximum 83.52 pounds of powder per hour.
- (3) One (1) blast room, identified as SB1, approved in 2013 for construction to clean trailer frames, maximum capacity of 6.5 tons/hr of steel frames, and 150 lb/hr of media, equipped with particulate control, exhausting inside.
- (4) One hundred forty (140) metal inert gas (MIG) welding stations, approved in 2013 for construction, each with a maximum electrode usage rate of 4.0 lbs of wire per hour.
- (5) Natural Gas Combustion:
  - (a) One (1) natural gas-fired dry-off oven, rated at 10.80 million British thermal units per hour (MMBtu/hr), with a maximum capacity of 6.5 tons per hour of parts, exhausting outside.
  - (b) One (1) natural gas-fired curing oven, rated at 10.80 million British thermal units per hour (MMBtu/hr), with a maximum capacity of 6.5 tons per hour of parts, exhausting outside.
  - (c) Seven (7) natural gas-fired heaters, identified as t1 through t7, capacity: 0.01 million British thermal units per hour each, exhausting outside.
  - (d) Two (2) natural gas-fired forced air furnaces, identified as f1 and f2, approved in 2013 for construction, capacity: 0.125 million British thermal units per hour each, exhausting outside.
  - (e) Ten (10) natural gas-fired GFA heaters, identified as gfa1 and gfa10, approved in 2013 for construction, capacity: 1.75 million British thermal units per hour each, exhausting outside.

- (f) Two (2) natural gas-fired GFA heaters, identified as gfa11 and gfa12, approved in 2013 for construction, capacity: 1.75 million British thermal units per hour each, exhausting outside.

<b>Integral part of the Process Determination</b>
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The applicant has submitted the following justification such that the cartridge filters installed in the powder spray booth be considered as an integral part of the powder coating process:

- (a) The use of the powder recovery system allows the source to recover and reuse all of the powder that has not adhered during the coating process, which results in an overwhelming net economic benefit.
- (b) The powder coating booth or room does not have any exhaust stacks or vents. It is also under negative pressure so no air can escape the room.
- (c) The powder reclaim system collects unused powder during the coating process. The powder reclaim capture system is 100% efficient at capturing unused powder. The cost savings associated with the product recovery far outweigh of the cost of installation, operation and maintenance of the product recovery system.

IDEM, OAQ has evaluated the justifications and agrees that the powder coating recovery systems be considered an integral part of the powder coating process. Therefore, the permitting level will be determined using the potential to emit after the cartridge filters. Operating conditions in the proposed permit will specify that cartridge filters shall operate at all times when each powder coating system is in operation. This determination is based on the data provided by the source.

<b>Enforcement Issues</b>
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There are no pending enforcement actions related to this source.

<b>Emission Calculations</b>
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See Appendix A of this TSD for detailed emission calculations.

<b>Permit Level Determination – MSOP</b>
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The following table reflects the unlimited potential to emit (PTE) of the entire source after integral powder coating booth controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
*PM	759
PM10 <sup>(1)</sup>	63.3
PM2.5	63.3
SO <sub>2</sub>	2.09
NO <sub>x</sub>	13.88
VOC	0.06
CO	9.9
GHGs as CO <sub>2</sub> e	14,152
Total HAPs	0.22

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

- \*NOTE: 1. The particulate (PM) emissions from powder spray booths are before powder spray booth integral control system.
2. The particulate (PM) emissions from blasting operation are based on the process throughput.
- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM10, PM2.5 are each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Greenhouse gases (GHGs) as CO<sub>2</sub>e

- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of greenhouse gases (GHGs) is less than the Title V subject-to-regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) emissions per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

**PTE of the Entire Source After Issuance of the MSOP**

The table below summarizes the potential to emit of the entire source after issuance of this MSOP, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of MSOP (tons/year)									
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Powder Spray Booth ( EU1)	6.40	6.40	6.40	--	--	--	--	--	--	--
Powder Spray Booth ( EU1)	6.40	6.40	6.40	--	--	--	--	--	--	--
Natural Gas combustion	0.22	0.90	0.90	2.09	13.88	0.06	9.90	14,152	0.22	0.22
Blasting operation- Surface prep	***65.13	48.40	48.40	--	--	--	--	--	--	--
Welding	13.49	1.23	1.23	--	--	--	--	--	--	--
<b>Total PTE of Entire Source</b>	<b>91.6</b>	<b>63.9</b>	<b>63.9</b>	<b>2.09</b>	<b>13.88</b>	<b>0.06</b>	<b>9.90</b>	<b>14,152</b>	<b>&lt;10</b>	<b>&lt;25</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM <sub>10</sub> ), not particulate matter (PM), is considered as a "regulated air pollutant". **The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject-to-regulation thresholds for GHG in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. *** allowable PTE pursuant to 326 IAC 6-3										

**Federal Rule Applicability Determination**

New Source Performance Standards (NSPS)

- The requirements of 326 IAC 12 or 40 CFR 60, Subpart MM (60.390 through 60.398), Standards of Performance for the Automobile and Light Duty Bus surface Coating Operations are not included in the permit, because this source manufactures and assembles travel trailers.
- The natural-gas fired curing and dry-off ovens for cleaning do not burn solid waste, as defined in 40 CFR 60, Subpart E. Therefore, the requirements of the New Source Performance Standards for Incinerators, 40 CFR 60, Subpart E, are not included in this permit.
- There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63.3880 - 63.3981), because this source is not a major source of HAPs as defined in 40 CFR 63.2.

- (b) This source is not subject to the requirements 40 CFR 63 Subpart T (National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning) because the source is not equipped with a degreaser or parts washer.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart IIII, Surface Coating of Automobiles and Light-Duty Trucks (40 CFR Part 63.3080 - 63.3176), because this source is not a major source of HAPs as defined in 40 CFR 63.2 and does not surface coat automobiles or light duty trucks as defined by 63.3176. This source assembles travel trailers.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Large Appliances, 40 CFR 63.4080, Subpart NNNN (326 IAC 20-63), are not included in the permit, since the spray booths (EU1 and EU2) are not located in or are not part of a major source of HAPs and do not coat large appliances.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Surface Coating of Metal Furniture, 40 CFR 63.4880, Subpart RRRR (326 IAC 20-78), are not included in the permit, since the booths are not located in or are not part of a major source of HAPs.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in this permit because the source does not do any paint stripping operations, auto body refinishing operations, or use any solvents or coatings containing the target HAPs (compounds of chromium, lead, manganese, nickel, or cadmium) as defined by 40 CFR 63.11180.
- (g) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Parts 61, 63) included in the permit for this source.

#### Compliance Assurance Monitoring (CAM)

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<b>State Rule Applicability Determination</b>
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#### 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

#### 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))

This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated criteria pollutants except PM are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than 100,000 tons of CO<sub>2</sub>e per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

The allowable Particulate (PM) emissions from the blasting operation are limited by 326 IAC 6-3-2 to 65.13 tons/yr, based on the process throughput of 6.575 tons/hr. The potential to emit for this process is determined based on the allowable emissions.

The cartridge filtration system is considered an integral part of the powder coating process and will operate at all times that the powder coating process is operating in order to comply with 326 IAC 6-3-2; therefore, the potential to emit particulate (PM) emissions after the integral control system was used to determine that source-wide particulate emissions are 91.6 tons/yr. Therefore, a PSD minor limit for particulate (PM) is not included in this permit. (See TSD Appendix A.)

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year.

**State Rule Applicability - Powder Spray Booths EU1 and EU2:**

326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes)

The particulate matter (PM) from each of the powder spray booths, identified as EU1 and EU2, shall each be limited to less 14.37 pounds per hour, when operating at a process weight rate of 6.5 tons per hour.

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

OAQ has determined the cartridge filtration system is integral to each of the powder spray booths, EU1 and EU2. The respective cartridge filtration system must be in operation at all times when the powder spray booth is in operation in order to comply with this limit. The Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The powder coating booths are not subject to 326 IAC 8-2-9 since the powder coating booths have no potential to emit VOC.

There are no other 326 IAC 8 Rules that are applicable to the facility.

### **State Rule Applicability - Blast Room SB1**

#### **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-2, the particulate from the surface preparation operation shall not exceed 14.87 pounds per hour, when operating at a maximum process weight rate of 6.5 tons per hour and 150 lbs/hr of media. The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Based on calculations, the control device is required to comply with this limit.

### **State Rule Applicability - Natural Gas space heaters and curing/dry-off ovens**

#### **326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)**

The natural gas-fired space heaters, units are each not subject to 326 IAC 6-2 as they are not sources of indirect heating.

#### **326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-1(b)(14), the source-wide space heaters are not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because they each have the combined potential to emit particulate matter less than 0.551 pounds per hour.

#### **326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-2(e)(2), under 326 IAC 6-3-1(b) or (c), the dry-off and curing ovens each have a maximum process weight rate less than 100 pounds per hour and particulate emissions less than 0.551 pounds per hour.

#### **326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)**

The space heaters are not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions of sulfur dioxide are less than twenty-five (25) tons per year and ten (10) pounds per hour.

### **State Rule Applicability - Welding operation**

#### **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

The welding stations at this source do not consume more than 625 pounds of rod or wire per day, each. Therefore, these welding stations are exempt from the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(b)(9).

<b>Compliance Determination, Monitoring and Testing Requirements</b>
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- |  |
|--|
| <p>(a) The cartridge filtration system, integral to each of the powder coating booths for particulate control, shall be in operation at all times when the respective powder coating booths, identified as EU1 and EU2 are in operation.</p> <p>(b) The control system for particulate control shall be in operation and control emissions from the blaster, identified as SB1, at all times that the blaster is in operation.</p> |
|--|

<b>Conclusion and Recommendation</b>
--------------------------------------

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on December 13, 2012.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and New Source Review and MSOP No.: M039-32633-00736. The staff recommends to the Commissioner that this New Source Construction and New Source Review and MSOP be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Swarna Prabha at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-5376) or toll free at 1-800-451-6027 extension (4-5376).
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.in.gov/idem](http://www.in.gov/idem)



**Company Name:** Fortress Technologies, LLC  
**Address, City IN Zip:** 14489 US 20, Middlebury, IN 46540  
**MSOP Permit No.:** M039-32633-00736  
**Reviewer:** Swarna Prabha  
**Date:** 1/24/2013

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**Unlimited PTE (tons/yr)**

	PM	PM10	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	GHG as CO <sub>2</sub> e	HAPs
*Powder Spray Booth-EU1	128.04	128.04	128.04	--	--	--	--	--	--
*Powder Spray Booth-EU2	128.04	128.04	128.04	--	--	--	--	--	--
Natural Gas Combustion	0.22	0.90	0.90	2.09	13.88	0.06	9.90	14,152	0.22
Blasting -surface prep	489.57	48.96	48.96	--	--	--	--	--	--
Welding	13.49	1.23	1.23	--	--	--	--	--	--
<b>Total</b>	<b>759.4</b>	<b>307.2</b>	<b>307.2</b>	<b>2.09</b>	<b>13.88</b>	<b>0.06</b>	<b>9.90</b>	<b>14,152</b>	<b>0.22</b>

**Limited PTE (tons/yr)**

	PM	PM10	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	GHG as CO <sub>2</sub> e	HAPs
Powder Spray Booth-EU1	6.40	6.40	6.40	--	--	--	--	--	--
Powder Spray Booth-EU2	6.40	6.40	6.40	--	--	--	--	--	--
Natural Gas Combustion	0.22	0.90	0.90	2.09	13.88	0.06	9.90	14,152	0.22
**Blasting -surface prep	65.13	48.96	48.96	--	--	--	--	--	--
Welding	13.49	1.23	1.23	--	--	--	--	--	--
<b>Total</b>	<b>91.6</b>	<b>63.9</b>	<b>63.9</b>	<b>2.09</b>	<b>13.88</b>	<b>0.06</b>	<b>9.90</b>	<b>14,152</b>	<b>0.22</b>

\* PM emissions before powder spray booth integral control system.

\*\* Allowable PM emissions from blasting operation

Total emissions based on rated capacity at 8,760 hours/year.

**Appendix A: Emission Calculations**  
**Process Operations**  
**Emission Units EU1 and EU2**

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Company Name: Fortress Technologies, LLC  
Address, City IN Zip: 14489 US 20, Middlebury, IN 46540  
MSOP Permit No.: M039-32633-00736  
Reviewer: Swarna Prabha  
Date: 1/24/2013

Emission Unit	Maximum Powder Use (lbs/hr)	Maximum Powder Use (tons/yr)	Conservative Transfer Efficiency (%)	Bag filter Efficiency	PTE before bag filters PM/PM <sub>10</sub> (lbs/hr)	PTE before bag filter PM/PM <sub>10</sub> (tons/yr)	PTE before bag filter PM/PM <sub>10</sub> (lbs/hr)	PTE after Bag filter PM/PM <sub>10</sub> (tons/yr)	PM/PM <sub>10</sub> Allowable PM lbs/hr
Powder Spray Booth-EU1	83.520	365.818	65.0%	95.0%	29.23	128.0	1.462	6.40	
Powder Spray Booth-EU2	83.520	365.818	65.0%	95.0%	29.23	128.0	1.462	6.40	
<b>Total</b>					<b>58.46</b>	<b>256.1</b>	<b>2.923</b>	<b>12.80</b>	

**Methodology**

Potential Emissions (lbs/hr) = Powder usage rate (lbs/hr)\* (1- transfer efficiency)

Emissions (tons/yr) = Emissions (lbs/hr) \* 8760 hrs/yr / 2000 lbs/ton

PM10 and PM2.5 emissions are assumed to equal PM.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**

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**Company Name:** Fortress Technologies, LLC  
**Address, City IN Zip:** 14489 US 20, Middlebury, IN 46540  
**MSOP Permit No.:** M039-32633-00736  
**Reviewer:** Swarna Prabha  
**Date:** 1/24/2013

Heat Input Capacity	Potential Throughput
	MMCF/yr
	MMBtu/hr
Tube heaters (7)	0.1 0.6132
burn off, curing ovens (2)	21.6 189.22
Forced air Furnace (2)	0.25 2.19
GFA units (10)	1.5 13.14
GFA units (2)	3.5 30.66
<b>Total</b>	<b>26.92 235.8</b>

		Pollutant						
Emission Factor in lb/MMCF		PM*	PM10*	PM2.5	SO2	NOx	VOC	CO
		1.90	7.60	7.60	0.600	100	5.50	84.0
		**see below						
Potential Emission in tons/yr		0.224	0.896	0.896	0.071	11.791	0.649	9.904
	Total	0.224	0.896	0.896	2.087	13.878	0.649	9.904

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology:**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

		HAPs - Organics				
Emission Factor in lb/MMcf		Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
		0.00210	0.00120	0.075	1.80	0.00340
Potential Emission in tons/yr		<b>0.000248</b>	<b>0.000141</b>	<b>0.008843</b>	<b>0.212237</b>	<b>0.000401</b>

		HAPs - Metals				
Emission Factor in lb/MMcf		Lead	Cadmium	Chromium	Manganese	Nickel
		0.0005	0.0011	0.0014	0.0004	0.0021
Potential Emission in tons/yr		<b>0.00006</b>	<b>0.00013</b>	<b>0.00017</b>	<b>0.00004</b>	<b>0.00025</b>
	<b>Total</b>					<b>0.223</b>

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

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**Source wide combustion CO2e emissions potential**

**Company Name:** Fortress Technologies, LLC  
**Address, City IN Zip:** 14489 US 20, Middlebury, IN 46540  
**MSOP Permit No.:** M039-32633-00736  
**Reviewer:** Swarna Prabha  
**Date:** 1/24/2013

**Part 70 Operating Permit Renewal No.:**

**Reviewer:** Swarna Prabha

**Date:**

	MMBtu/hr	Potential Throughput MMCF/yr
Tube heaters (7)	0.1	0.6132
burn off, curing ovens (2)	21.6	189.22
Forced air Furnace (2)	0.25	2.19
GFA units (10)	1.5	13.14
GFA units (2)	3.5	30.66
<b>Total</b>	<b>26.9</b>	<b>235.8</b>

**Greenhouse Gas Emissions**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000.00	2.3	2.2
Existing furnaces and boilers -PTE in tons/yr	14,149.15	0.27	0.12

Summed Existing Furnaces and boilers Potential Emissions in tons/yr	14,149.54
Existing Furnaces and boilers -CO2e in tons/yr	14,152.11

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2 lb/MMcf. The N2O Emission Factor for low Nox burner is 0.64 lb/MMcf.  
Emission

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emissions Calculations**  
**Twelve (12) Welding stations**

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**Company Name: Fortress Technologies, LLC**  
**Address, City IN Zip: 14489 US 20, Middlebury, IN 46540**  
**MSOP Permit No.: M039-32633-00736**  
**Reviewer: Swarna Prabha**  
**Date: 1/24/2013**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel)	140	4		0.0055	0.0005			3.080	0.280	0.000	0.000	0.280
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
	0	0	0	0	0	0	0	0.000	0.000	0.000	0.000	0.000
	0	0	0	0	0		0	0.000	0.000	0.000	0.000	0.000
	0	0	0	0				0.000	0.000	0.000	0.000	0.000
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								3.080	0.280	0.000	0.000	0.280
Potential Emissions lbs/day								73.92	6.720	0.00	0.00	6.720
Potential Emissions tons/year								13.49	1.226	0.00	0.00	1.226

**METHODOLOGY**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emissions Calculations**

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**Blasting Dust Collector**

**Company Name:** Fortress Technologies, LLC  
**Address, City IN Zip:** 14489 US 20, Middlebury, IN 46540  
**MOP Permit No.:** M039-32633-00736  
**Reviewer:** Swarna Prabha  
**Date:** January 26, 2013

Process Description	Controls Description and IDs	Max. Blasted (tons/hr)	PM Emission Factor Before Control (lbs/ton)	PM10 Emission Factor Before Control (lbs/ton)	Uncontrolled PTE of PM (lbs/hr)	Uncontrolled PTE of PM (ton/yr)	326 IAC 6-3-2 PM Limit (lb/hr)	326 IAC 6-3-2 PM Limit (tons/yr)	326 IAC 2-2 PM Limit (lb/hr)	326 IAC 2-2 PM Limit (tons/yr)	Controlled PTE of PM (ton/yr)
Blast Surface Preparation of steelParts	Cartridge Filters	6.58	17.0	1.70	111.8	489.57	14.48	63.4	5.59	24.5	4.90

Process Description	Uncontrolled PTE of PM10 (lbs/hr)	Uncontrolled PTE of PM10 (ton/yr)	326 IAC 2-2 PM10 Limit (lb/hr)	326 IAC 2-2 PM10 Limit (tons/yr)	Controlled PTE of PM10 (ton/yr)
Blast Surface Preparation of steel Parts	11.18	49.0	3.31	14.50	0.11

The control efficiency of the cartridge filter is 99%.  
 Emission factor is from EPA FIRE Version 6.25 - Gray Iron Foundries, Grinding/Cleaning (SCC: 3-04-003-40).

**Methodology**

PM/PM10 Potential to Emit (lbs/hr) = Max. Abrasive Usage (tons/hr) \* PM/PM10 Emission Factor (lbs/ton)  
 PM/PM10 Potential to Emit (tons/yr) = Max. Abrasive Usage (tons/hr) \* PM/PM10 Emission Factor (lbs/ton) \* 8,760 hrs/yr \* 1 ton/2,000 lbs  
 PM/PM10 Potential to Emit After Control (lbs/hr) = PM/PM Potential to Emit Before Controls (lbs/ton) \* (1 - Control Efficiency)  
 PM/PM10 Potential to Emit After Control (tons/yr) = PM/PM Potential to Emit Before Controls (tons/yr) \* (1 - Control Efficiency)



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

April 1, 2013

Mr. Jim Bergan  
Fortress Technologies  
14489 US 20  
Middlebury, IN 46540

Re: Public Notice  
Fortress Technologies  
Permit Level: New Construction MSOP  
Permit Number: 039 - 32633 - 00736

Dear Mr. Bergan:

Enclosed is a copy of your draft New Construction MSOP, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Middlebury Public Library, 101 East Winslow, P.O. Box 192 in Middlebury IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Elkhart Truth in Elkhart, In publish this notice no later than April 7, 2013.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Swarna Prabha, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5376 or dial (317) 234-5376.

Sincerely,  
*Len Pogost*

Len Pogost  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter. dot 3/27/08



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### ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

April 1, 2013

Elkhart Truth  
Attn: Classifieds  
421 South Second Street  
Elkhart, Indiana 46515

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Fortress Technologies, Elkhart County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than April 7, 2013.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

*Len Pogost*

Len Pogost  
Permit Branch  
Office of Air Quality

Permit Level: New Construction MSOP  
Permit Number: 039 - 32633 - 00736

Enclosure  
PN Newspaper.dot 3/27/08





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[www.idem.IN.gov](http://www.idem.IN.gov)

April 1, 2013

To: Middlebury Public Library

From: Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

**Applicant Name: Fortress Technologies**  
**Permit Number: 039 - 32633 - 00736**

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures  
PN Library.dot 03/27/08



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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### Notice of Public Comment

**April 1, 2013**  
**Fortress Technologies**  
**039 - 32633 - 00736**

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.


Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

**Please Note:** *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure  
PN AAA Cover.dot 3/27/08

# Mail Code 61-53

IDEM Staff	LPOGOST 4/1/2013 Fortress Technologies LLC 039 - 32633 - 00736 draft		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Jim Bergan Fortress Technologies LLC 14489 US 20 Middlebury IN 46540 (Source CAATS)									
2		Elkhart County Health Department Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
3		Middlebury Town Council and Town Manager P.O. Box 812, 418 North Main Street Middlebury IN 46540 (Local Official)									
4		Middlebury Public Library 101 East Winslow, P.O. Box 192 Middlebury IN 46540-0192 (Library)									
5		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
6		Ms. Stephanie Redding American Consulting PO Box 59 Osceola IN 46561 (Consultant)									
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